

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 04-10816-MLW

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ABC MORTGAGE CORPORATION  
f/k/a JOHN G. MACLEOD d/b/a ABC  
MORTGAGE COMPANY,

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Plaintiff,

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v.

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SCOTTSDALE INSURANCE, CO.

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Defendant.

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\* \* \* \* \*

**PARTIES' JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)**

I. Joint Discovery Plan

The parties propose the following discovery plan:

- a. Automatic disclosure shall be made by July 20, 2005;
- b. Factual discovery shall be completed by November 1, 2005;
- c. The plaintiff shall provide reports of its expert(s) by December 1, 2005;
- d. The defendant shall provide reports of its expert(s) by January 3, 2006;
- e. All expert discovery shall be completed by February 3, 2006.

II. Proposed Schedule for the Filing of Motions

- a. Any summary judgment motions shall be filed by April 7, 2006;
- b. Any opposition to a summary judgment motion shall be filed by May 8, 2006 or within thirty (30) days from the date the summary judgment motion is filed.

III. Certifications Pursuant to Local Rule 16.1(D)(3)

Plaintiff's certification is attached hereto; Defendant shall be filed separately in advance of the scheduling conference.

Respectfully submitted,

SCOTTSDALE INSURANCE COMPANY,

By its attorney,

ABC MORTGAGE CORPORATION f/k/a  
JOHN G. MACLEOD d/b/a ABC  
MORTGAGE COMPANY,

By its attorneys,

/s/ Stephen J. Abarbanel

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Dated: June 3, 2005

